

Exhibit A

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION

CONSOLIDATED INDUSTRIES, LLC)	
d/b/a WEATHER KING PORTABLE)	
BUILDINGS,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:22-cv-01230-STA-jay
)	
JESSE A. MAUPIN, BARRY D.)	
HARRELL, ADRIAN S. HARROD,)	Chief Judge S. Thomas Anderson
LOGAN C. FEAGIN, STEPHANIE L.)	
GILLESPIE, RYAN E. BROWN, DANIEL)	
J. HERSHBERGER, BRIAN L. LASSEN,)	
ALEYNA LASSEN, and AMERICAN)	
BARN CO., LLC,)	
)	
Defendants.)	

PLAINTIFF'S RULE 26(a)(2) EXPERT DISCLOSURE

Pursuant to Fed. R. Civ. P. 26(a)(2), Plaintiff discloses that it may call Douglas K. Southard as an expert witness at the trial of this action. Mr. Southard's written report and Rule 26(a)(2)(B) disclosures are attached hereto as Exhibit A, and his report is designated CONFIDENTIAL in accordance with the Court's Protective Order.

Respectfully submitted,

BUTLER SNOW LLP

/s/ David L. Johnson

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2025, I served the foregoing document via email upon Defendants' counsel of record as follows:

Thomas G. Pasternak (admitted pro hac vice)
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And to the following via U.S. Mail and email.

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/s/ David L. Johnson
David L. Johnson

EXHIBIT A

DOUGLAS K. SOUTHARD, DBA, CFA**Compliance With Rule 26(a)(2) of the Federal Rules of Civil Procedure****(2) Disclosure of Expert Testimony.**

(B) Witnesses Who Must Provide a Written Report. Unless otherwise stipulated or ordered by the court, this disclosure must be accompanied by a written report--prepared and signed by the witness--if the witness is one retained or specially employed to provide expert testimony in the case or one whose duties as the party's employee regularly involve giving expert testimony. The report must contain:

(i) a complete statement of all opinions the witness will express and the basis and reasons for them;

See the attached report

(ii) the facts or data considered by the witness in forming them;

See the attached report

(iii) any exhibits that will be used to summarize or support them;

See the attached report

(iv) the witness's qualifications, including a list of all publications authored in the previous 10 years;

See attached and report

(v) a list of all other cases in which, during the previous 4 years, the witness testified as an expert at trial or by deposition;

None during the previous 4 years

and

(vi) a statement of the compensation to be paid for the study and testimony in the case.

Professional fees of \$15,000.00 were received as a retainer in February 2023.

Professional fees of \$34,750.00 and expenses of \$3,120.67 were invoiced on March 29, 2025 (invoice outstanding).

Professional fees for litigation related services will be incurred on an hourly basis. Current billing rates are as follows: (1) \$500.00 per hour for preparation time; (2) \$500.00 per hour for deposition, with a minimum of \$2,500.00 – plus travel time and related expenses; (3) \$5,000.00 per day for trial – plus travel time and related expenses; and (4) actual out-of-pocket expenses related to testimony and/or deposition. Deposition and testimony fees, as well as estimated travel and related expenses will be due in advance of those services.



Douglas K. Southard, DBA, ASA

March 31, 2025
